

EXHIBIT A

***[Proposed] Amendment to the Stipulation and Agreed Order re Mediation of Contested Matter
re Claim no. 18496-1***

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
)	
W. R. GRACE & CO., et al., ¹)	Case No. 01-01139 (AMC)
)	(Jointly Administered)
Reorganized Debtor.)	
)	Related Docket no.: 33124

**AMENDMENT TO THE STIPULATION AND AGREED ORDER RE MEDIATION OF
CONTESTED MATTER RE CLAIM NO. 18496-1**

The above-captioned reorganized debtor (the “Reorganized Debtor”) and claimant State of Montana through the Department of Environmental Quality (“MDEQ”) and Natural Resource Damage Program (“NRDP”) in the contested matter regarding claim no. 18496-1 filed by MDEQ, agree and stipulate as follows:

1. The *Stipulation and Agreed Order re Mediation of Contested Matter re Claim no. 18496-1* (the “Mediation Scheduling Order”) is amended to delete the following provision:

Date	Event
November 27, 2019	Montana files detailed amended proof of claim stating their claims, the basis for those claims, and the estimated amounts sought for each such claim

2. The parties further agree that the following provision should be substituted:

Montana shall file an amended proof of claim no later than 90 days after the mediator files the certificate of completion.

3. All other provisions of the Mediation Scheduling Order shall remain in effect as if fully set forth herein.

¹ W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc., or “Grace”) is the sole remaining Reorganized Debtor and Case no. 01-1139 is the sole remaining open chapter 11 case.

Dated: November 22, 2019

THE LAW OFFICES OF ROGER HIGGINS, LLC
Roger J. Higgins
516 N. Ogden Ave.
Suite 136
Chicago, IL 60642
(312) 666-0431

and

PACHULSKI STANG ZIEHL & JONES LLP

/s/ James E. O'Neill

Laura Davis Jones (Bar No. 2436)
James E. O'Neill (Bar No. 4042)
919 North Market Street, 17th Floor
P.O. Box 8705
Wilmington, DE 19899-8705
(302) 652-4100
(302) 652-4400

Co-Counsel for the Reorganized Debtor

and

WOMBLE BOND DICKINSON (US) LLP

/s/ Kevin J. Mangan

Kevin J. Mangan (Del. Bar No. 3810)
Ericka F. Johnson (Del. Bar No. 5024)
1313 North Market Street, Suite 1200
Wilmington, Delaware 19801
Telephone: (302) 252-4320
Facsimile: (302) 252-4330

*Counsel for Montana Department of Environmental
Quality*

a. SO ORDERED.

b. This Order shall be effective and enforceable immediately upon entry and its provisions shall be self-executing and shall not be stayed under Fed. R. Bankr. P. 7062, Fed. R. Bankr. P. 9014 or otherwise.

Dated: _____, 2019

Honorable Ashely M. Chan
United States Bankruptcy Judge